COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-34

REQUEST: Department's Information Requests to WorldCom, Inc.

DATE: April 29, 2002

DTE-WCOM 1-1: Refer to VZ-WCOM-2-2, where WorldCom identifies the current percentage of WorldCom's special access lines are served by its own facilities (i.e., on-net), and the percent of WorldCom's special access lines that are served using facilities owned by Verizon. Please provide a forecast for "off-net" facilities within the 2003-2008 time period, if one is available.

Respondent: Karen K. Furbish

RESPONSE: WorldCom does not have a forecast available that is responsive to the request.

As a clarification, WorldCom did not identify "the current percentage of WorldCom's special access lines [] served by its own facilities (i.e., on-net)" in its response to VZ-WCOM-2-2; WorldCom only provided information concerning its "off-net" facilities in response to the request.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-34

REQUEST: Department's Information Requests to WorldCom, Inc.

DATE: April 29, 2002

DTE-WCOM 1-2: Please refer to the Joint Competitive Industry Group metrics, attachment C to WorldCom's February 6th, 2002 testimony at page 7 "On Time Performance To FOC Due Date." Business Rule 5 states, " A Customer Not Ready (CNR) is a verifiable situation beyond the normal control of the ILEC..." How is a CNR "verified" as required by the metric?

Respondent: Karen K. Furbish

RESPONSE: WorldCom has established a toll-free number and a process, to which ILECs have agreed in principle, in situations that lead ILEC personnel to conclude that a WorldCom customer is not ready. In the event that ILEC personnel arrive at a customer's premises to provision a special access service at the agreed upon date, and conclude that the customer is not ready, the process calls for the ILEC to call WorldCom's specially designated toll-free number to alert WorldCom of the potential CNR situation. WorldCom in turn requests that the ILEC personnel give WorldCom fifteen minutes to attempt to contact the customer's appropriate personnel. Therefore, under this process, both WorldCom and the ILEC would have a record of the actual situation when the ILEC cannot complete the installation for customer-caused reasons.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-34

REQUEST: Department's Information Requests to WorldCom, Inc.

DATE: April 29, 2002

DTE-WCOM 1-3: Please refer to page 7 of WorldCom's April 3rd, 2002 surrebuttal testimony. How do Verizon's "ubiquitous facilities" give Verizon an advantage in the special access market, given that special access is a point to point service?

Respondent: Karen K. Furbish

RESPONSE: Having "point to point service" means having an uninterrupted circuit connecting two locations (points). It does not, however, mean that the two points are linked by a circuit traversing a direct path between them "as the crow flies." A customer seeking to obtain a dedicated point-to-point circuit between two locations (whether twenty miles or twenty blocks apart from each other) will in virtually every instance already have a possible pathway for such a dedicated circuit – the loop and interoffice facilities of the incumbent LEC (the only issue being whether existing facilities are available or whether those facilities need to be augmented to accommodate the customer's needs).

As legacy monopoly providers, Verizon and other incumbent LECs are the only entities that have "last-mile" facilities capable of serving virtually all business and institutional customers. Verizon and other incumbent LECs thus have access to most, if not all, commercial and institutional buildings. The facilities that connect customer premises to incumbent LEC central offices are themselves connected by a vast network of inter-office facilities. There is no competitor of any incumbent LEC that has such network and facilities ubiquity because it has not been economically feasible to completely duplicate the incumbents' networks and facilities. (This is especially the case with respect to connections to customer premises; obtaining building access can often be problematic for competitors of the incumbent.) The existence of incumbent LEC-controlled circuit pathways that could conceivably connect any two locations within the incumbent's service territory gives the incumbent a tremendous competitive advantage over competitors. The ubiquity of

incumbent LEC connectivity also ensures that to the extent end-user customers agree to have CLECs as their service providers, the CLECs will in many (if not most) instances be beholden to the incumbent for connections between the customer and their own network facilities (*e.g.*, the link from the customer premises to the incumbent LEC central office in which the CLEC is collocated, transport between CLEC collocation arrangements in different incumbent LEC central offices, "entrance facilities" between CLEC/IXC long distance switch and the incumbent LEC's Serving Wire Center nearest the customer).

See the two attached slides illustrating a generic schematic of an incumbent LEC network and how CLECs/IXCs would utilize incumbent LEC Special Access services.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-34

REQUEST: Department's Information Requests to WorldCom, Inc.

DATE: April 29, 2002

DTE-WCOM 1-4: Assuming that it is possible to order a dedicated circuit from a CAP, does it take longer to provision a dedicated circuit from a CAP or from Verizon? If the answer depends on the type of circuit and/or whether facilities exist, be sure to specify this in your answer. In addition, please provide any supporting documentation to support your answer.

Respondent: Karen K. Furbish

RESPONSE: Generally, Special Access provisioning intervals by CAPs or CLECs are shorter than the intervals WorldCom has experienced with the major ILECs, including Verizon. However, the ability to meaningfully compare the differences in provisioning intervals between Verizon and alternative providers is compromised by virtue of the fact that WorldCom is not electronically bonded with most of the CAPS/CLECs from which it purchases dedicated circuits, whereas WorldCom is electronically bonded with Verizon. Electronic bonding is a term for the ability to exchange information (in this case, ordering, provisioning and maintenance-related information) between carriers' Operations Support Systems via secure gateways.

In Massachusetts, there is one competitive provider of dedicated circuits to which WorldCom is electronically bonded, enabling more of an "apples-to-apples" comparison of provisioning intervals. WorldCom has compared the DS1 installation intervals experienced by WorldCom from "CLEC X" to the DS1 installation intervals experienced by WorldCom from Verizon, in Massachusetts. Looking at the monthly results for the last 12 months, and for the first quarter of 2002, both sets of results indicate that "CLEC X" has, on average, installed dedicated circuits for WorldCom faster than Verizon.

?? The same WorldCom systems and methodologies are used to measure both the CLEC X's and Verizon's installation

performance;

?? WorldCom's internal data for Verizon have not been reconciled with Verizon. Verizon may not measure, calculate and report its installation intervals to WorldCom in the same way WorldCom develops its internal measurements. Although WorldCom's internal measurements of Verizon's installation intervals may not match Verizon's self-reported results for WorldCom, and the monthly sample size for the CLEC is much smaller than the monthly sample size of Verizon installations, the overall trends and magnitude of difference between the CLEC and Verizon installation intervals do reflect actual experience;

?? The installation interval data are based on new installations and changes. The data do not include disconnects;

?? WorldCom measurements are based on circuits completed during a calendar month reporting period and averaged for the last 12 months and the first quarter of 2002;

?? Number of days shown are business days.

The specific comparison appears on the attachment to this response. WorldCom considers this attachment to be proprietary and confidential and will provide this information to parties subject to the terms of a mutually acceptable Protective Agreement.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-34

REQUEST: Department's' Information Requests to WorldCom, Inc.

DATE: April 29, 2002

DTE-WCOM 1-5: Provide a price comparison of the prices WorldCom pays for special access services.

Respondent: Karen K. Furbish

RESPONSE: WorldCom is unable to provide the prices it pays for purchasing special access services from any CAPs or other CLECs due to WorldCom-CAP/CLEC contract provisions that preclude any disclosure of competitive prices specified in those unregulated contracts. Since ILECs remain dominant (according to the FCC) in the provision of Special Access services, only tariffed ILEC pricing is publicly available.